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8 **UNITED STATES DISTRICT COURT**
9 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
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11 IN RE: SOCIAL MEDIA ADOLESCENT
12 ADDICTION/PERSONAL INJURY
13 PRODUCTS LIABILITY LITIGATION

MDL No. 3047

Case Nos.: 4:22-md-03047-YGR-PHK

14 THIS DOCUMENT RELATES TO:
15 ALL ACTIONS

**DECLARATION OF CHRISTOPHER
CHIOU IN SUPPORT OF OMNIBUS
SEALING STIPULATION
REGARDING DKT. NOS. 1197-1198
(JOINT LETTER BRIEF RE
PLAINTIFFS' RFP NOS. 16 AND 18)**

Judge: Hon. Yvonne Gonzalez Rogers
Magistrate Judge: Hon. Peter H. Kang

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19 I, Christopher Chiou, declare as follows:

20 1. I am a partner at the law firm of Wilson Sonsini Goodrich & Rosati and attorney
21 of record for Defendants YouTube, LLC and Google LLC (collectively ("YouTube")) in *In Re:*
22 *Social Media Adolescent Addiction/Personal Injury Products Liability Litigation*, Case No.:
23 4:22-md03047-YGR. I am licensed to practice law in the state of California and am admitted to
24 practice before this Court. I submit this declaration in support of the Omnibus Sealing
25 Stipulation Regarding Dkt. Nos. 1197-1198. I have personal knowledge of the facts set forth in
26 this declaration, and I could and would testify competently to their truth if called upon to do so.

27 2. On October 7, 2024, the Parties filed the Joint Letter Brief re Plaintiffs' RFP Nos.
28 16 and 18 (the "Joint Letter Brief") and its exhibit. ECF Nos. 1197-1198.

3. I have reviewed the documents that YouTube seeks to redact pursuant to the Court's Order Granting Motion to File Under Seal; Setting Sealing Procedures (ECF No. 341). Based on my review of the Joint Letter Brief and in consultation with YouTube, I understand there is good cause to seal the following information:

Dkt. No.	Description	Basis for Sealing
1197	Joint Letter Brief redacted at 2, 4	The redacted portions consist of sensitive and confidential information about YouTube's internal research and marketing and business strategies. Disclosure of the information would provide competitors with insights into YouTube's business they would not otherwise have, include trade secrets and competitive information, and thereby cause competitive harm to YouTube.
1197	Joint Letter Brief redacted at 1	The redacted portions consist of sensitive and confidential information about YouTube's confidential platform design. Disclosure of the information would provide competitors with insights into YouTube's business they would not otherwise have, include trade secrets and competitive information, and thereby cause competitive harm to YouTube.
1198-3	Exhibit A to Joint Letter Brief redacted at 16:9-10, 16-17	The redacted portions consist of sensitive and confidential information about YouTube's confidential platform design. Disclosure of the information would provide competitors with insights into YouTube's business they would not otherwise have, include trade secrets and competitive information, and thereby cause competitive harm to YouTube.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed at Los Angeles, California on October 21, 2024.

/s/ Christopher Chiou
Christopher Chiou